

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

GD DEAL HOLDINGS, LLC

Plaintiff,

v.

SURINDER MULTANI; ABBE PROPERTIES,  
LLC; SAPPHIRE SUPPLY, LLC; JCG  
INVESTMENTS, LLC; ABBE CAPITAL AND  
LEASING, LLC; ABBE MANAGEMENT  
GROUP, LLC; FIFTH THIRD BANK;  
CITIBANK; VENDOR CAPITAL GROUP;  
BABAJIPS, LLC; CAPITAL ACCESS &  
INVESTMENTS, LLC; PETROZONE  
PETROLEUM II, INC.; G&S PORTAGE, INC.;  
SAFANPREET MULTANI, in his capacity as  
trustee for Gurpriya Kaur Multani Irrevocable  
Trust; GURPAP SINGH MULTANI  
IRREVOCABLE TRUST, and JAPVI SINGH  
MULTANI IRREVOCABLE TRUST,

Defendants.

Civil Action No. 08-CV-1722

Judge Elaine E. Bucklo

**NOTICE OF AGREED MOTION**

TO: ALL COUNSEL OF RECORD

YOU ARE HEREBY NOTIFIED THAT on September 11, 2008, at 9:30 a.m., in Room 1441, or as soon thereafter as counsel may be heard, we shall appear before the Honorable Judge Bucklo, or any Judge presiding in that courtroom in the United States District Court for the Northern District of Illinois, and shall then and there present **AGREED MOTION FOR ENTRY OF PROTECTIVE ORDER**, a copy of which is attached hereto and hereby served upon you.

Dated: September 5, 2008

Respectfully submitted,

/s/ Nicole J. Highland

Lucia Nale

Diane R. Sabol (6298369)

Nicole J. Highland (6291632)

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*Attorneys for Defendant Citibank.*

**CERTIFICATE OF SERVICE**

I, Nicole J. Highland, an attorney, hereby certify that on September 5, 2008, I caused a true and correct copy of the foregoing **NOTICE OF UNOPPOSED MOTION**, to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/ s/ Nicole J. Highland

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